

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	Chapter 11
)	
W.R. GRACE & CO., et al.)	Case No. 01-01139 (JKF)
)	(Jointly Administered)
Debtors.)	
)	Related to Docket. No. 15084 and 15424

**DEBTORS' MOTION FOR EXPEDITED CONSIDERATION
OF MOTION OF EARLY, LUDWICK AND SWEENEY, LLC
FOR A PROTECTIVE ORDER WITH RESPECT TO
SUBPOENA ISSUED BY W. R. GRACE**

Debtors hereby request that the Court expedite consideration of the Motion Of Early, Ludwick and Sweeney, LLC For A Protective Order With Respect To Subpoena Issued By W.R. Grace (the "Motion") on an expedited basis and rule on the Motion without the need for any hearing. Under the present schedule, the Motion is set to be taken up by the Court at the May 21, 2007 omnibus hearing. Grace asks that the Court set an immediate telephonic hearing on the matter.

Expedited consideration and resolution of the Motion is warranted because prompt resolution of the Motion is necessary to ensure that the requested discovery is obtained in a timely manner and in accordance with the dates contained in the Case Management Order for the Estimation of Asbestos Personal Injury Liabilities.

WHEREFORE, W.R. Grace & Co. respectfully requests that the Court grant this motion for expedited consideration and rule on and approve the Motion at the Court's earliest convenience.

Dated: April 27, 2007

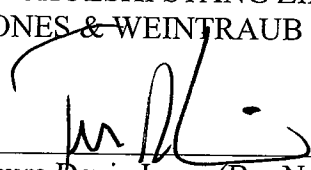
KIRKLAND & ELLIS LLP
David M. Bernick, P.C.
Janet S. Baer
Ellen Therese Ahern
200 East Randolph Drive
Chicago, Illinois 60601
(312) 861-2000

And

KIRKLAND & ELLIS LLP
Barbara M. Harding
David E. Mendelson
Amanda C. Basta
Brian T. Stansbury
655 Fifteenth Street, NW
Washington, D.C. 20005
(202) 879-5000

And

PACHULSKI STANG ZIEHL YOUNG
JONES & WEINTRAUB LLP



Laura Davis Jones (Bar No. 2436)
James E. O'Neill (Bar No. 4042)
Timothy P. Cairns (Bar No. 4228)
919 North Market Street, 17th Floor
P.O. Box 8705
Wilmington, DE 19899-8705 (Courier 19801)
Telephone: (302) 652-4100
Facsimile: (302) 652-4400

Co-Counsel for the Debtors and Debtors-in-Possession